

Federal Defenders
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July 30, 2019

SENIOR JUDGE STERLING JOHNSON, JR.
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Bernard Augustine, No. 18-393

Dear Judge Johnson,

We are writing on behalf of Bernard Augustine, with the consent of the government, respectfully seeking a second extension of time to file pre-trial motions. The defense has already filed a motion for a bill of particulars. Additional motions are currently due on August 2, 2019. The defense now seeks an extension of time until September 20, 2019, to file a motion to dismiss the indictment and a motion to suppress Mr. Augustine's statements. The reason for this second request is that the motions, particularly the suppression motion, have required a fact-intensive investigation into the circumstances of Mr. Augustine's arrest and interrogations that occurred in Tunisia in 2016. This investigation has taken a greater length of time than originally anticipated.

The defense respectfully requests that the court set the schedule to be: the defense motions due on September 20, the government's response to all motions, including the bill of particulars motion, due October 21, and the defense reply due November 11, 2019.

SO ORDERED
On this 31 day of July 2019
s/ Sterling Johnson Jr.
STERLING JOHNSON, JR., U.S.D.J.

Sincerely,

_____/s/
Sam Jacobson
Allegra Glashauser